

EXHIBIT A



November 1, 2020

Via Email – voters@montco.org &
Facsimile – 610-292-4527

Montgomery County Board of Elections
P.O. Box 311
Norristown, PA 19404-0311

Via Email – ken@montcopia.org
Facsimile – 610-292-4527

Kenneth E. Lawrence Jr., Chair
Montgomery County Board of Elections
P.O. Box 311
Norristown, PA 19404-0311

Via Email – JGale@montcopia.org
Facsimile – 610-292-4527

Joseph C. Gale, Vice Chair
Montgomery County Board of Elections
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Norristown, PA 19404-0311

Via Email – val@montcopia.org
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Valerie A. Arkoosh, MD, MPH
Montgomery County Board of Elections
P.O. Box 311
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Facsimile – 610-292-4527

Lee Soltysiak, Chief Clerk
Montgomery County Board of Elections
P.O. Box 311
Norristown, PA 19404-0311

Via Email – JStein1@montcopia.org
Facsimile – 610-292-4527

Josh Stein, Esquire, County Solicitor
One Montgomery Plaza
Suite 800
Norristown, PA 19404

Re: **LIST OF MONTCO VOTERS WHO REQUESTED AND/OR WERE SENT
MAIL-IN BALLOTS**

To the Honorable Members of the Montgomery County Board of Elections:

Further to my letter to the Board dated October 30, 2020, on behalf of Kathy Barnette, the Republican candidate for the United States House of Representatives, Pennsylvania 4th District, and her campaign committee, the Friends for Kathy Barnette (the “Barnette Parties”), my client is formally requesting the following information:

1. A complete list of all Montgomery County electors from all parties who requested and/or were sent mail-in or absentee ballots. This list should be provided electronically in one of the database formats, such as CSV (comma separated values). If you do not maintain such electronic/computer lists in a common database format, please provide the computerized/electronic list in the format used by the county and instructions for how to access the information. If the electronic/computerized format used by the county to maintain this list is proprietary and not available to the public, parties and candidates equally, then please provide the list in the same manner as you have to other requestors. We expect, at a minimum, that this

list will include the name of the voters, their addresses, voting precincts, party affiliation and the date(s) any such mail-in or absentee ballots were requested, the date(s) the ballots were sent to the voters and the date such ballots were returned by the voters for the canvass.

2. Please provide the Barnette Parties with a complete written set of the procedures the Board is employing regarding the handling of mail-in and absentee ballots including, without limitation, the processes for opening the outer mailing envelopes, the inner security envelopes and the basis for qualifying/disqualifying, accepting or rejecting a ballot before the inner security envelope is opened. If there are any ballots which have already been determined to be invalid for any reason, please supply the Barnette Parties with a list of the affected electors and the measures taken to contact them so that they can place a valid ballot by November 3rd. At today's meeting, ballot consideration standards and training for the ballot handlers was discussed. Please provide copies of the training materials so that we also know what standards and practices are being applied.
3. As we previously informed you, the Barnette Parties intend to be present and observe, in accordance with the PA Election Code, the entire processing of the mail-in/absentee ballots including, without limitation, the opening of the outer mailing envelopes and each step thereafter.

However, based on our tour today of the canvass facility located at the Montco Health and Human Services Building, 1430 DeKalb Street, Norristown, PA 19404, we were shocked at the poor observation arrangements that have been put into place for the watchers and representatives of the parties and the candidates. The "pen" like area at the end of the scanner room, supplemented by a single television with camera feeds (the functionality of which could not be demonstrated today, although requested) and a second remote room with two televisions, is unacceptable. For example, most of the envelope opening room cannot be visualized from the holding pen -- which brings us to the most fundamental problem of all. The opening in the wall separating the scanner area from the opening area is not only inadequate to allow proper observation by the observer, it makes it clear there are two rooms to be watched and not one.

We can offer you several options to make the canvass as transparent and fair as it should be. First and foremost, we urge you to assent to our making our own video and audio recordings as discussed in my letter dated October 30, 2020. At a minimum, you should provide all watchers with the ability to access the live feed of the video cameras you intend to use to supply images to the television sets mentioned above. We would work with you to develop proper protocols to maintain the video feeds and recordings thereof in a secure manner.

We are hopeful that you will be able to adequately respond to our inquiries in this and my prior letter. We hope to avoid litigation, but we must hear from you by noon tomorrow so that we are clear about where the Board stands and what we must do.

Thank you for your consideration.

Sincerely,

Andrew Teitelman

AT/s